1 Honorable Robert S. Lasnik 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT FOR THE 9 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 10 11 UNITED STATES OF AMERICA, NO. CR19-159RSL 12 Plaintiff 13 STIPULATED MOTION FOR PROTECTIVE ORDER 14 v. 15 16 PAIGE A. THOMPSON, Noting Date: October 25, 2019 17 Defendant. 18 19 The parties, by and through their respective counsel, file this Stipulated Motion for 20 Protective Order, and present the proposed order attached herewith. 21 The Indictment charges the above-captioned defendant with a scheme involving 22 the unauthorized access to the protected servers of various victim entities. As set forth in 23 the attached proposed Protective Order, which is incorporated herein by reference, this 24 case involves a substantial amount of electronic discovery, some of which contains 25

malware, stolen victim data, other contraband, and otherwise sensitive material. The

investigation efforts and ongoing matters occurring before the grand jury.

discovery material may also include law enforcement sensitive items related to ongoing

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Accordingly, the parties respectfully request the Court enter the proposed 1 2 Protective Order governing discovery in this matter. DATED this 25th day of October, 2019. 3 4 5 Respectfully submitted, 6 BRIAN T. MORAN 7 **United States Attorney** 8 // s // 9 ANDREW C. FRIEDMAN 10 STEVEN T. MASADA **Assistant United States Attorneys** 11 United States Attorney's Office 12 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 13 Telephone: 206.553.7970 14 Fax: 206.553.4440 15 16 Per authorization by email: 17 // s // 18 19 MOHAMMAD HAMOUDI CHRISTOPHER SANDERS 20 NANCY TENNEY 21 Assistant Federal Public Defenders 22 BRIAN E. KLEIN 23 Attorney, Baker Marquart LLP 24 Attorneys for Defendant Paige Thompson 25 26 27 28

1 | **CERTIFICATE OF SERVICE** I hereby certify that on October 25, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s). /s/ Kylie Noble **KYLIE NOBLE** Legal Assistant United States Attorney's Office 700 Stewart Street, Suite 5220 Seattle, WA 98101-3903 Telephone: (206) 553-2520 Fax: (206) 553-4440 E-mail: kylie.noble@usdoj.gov